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April 16, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: RM No. 10687

Dear Ms. Dortch:

The American Short Line and Regional Railroad Association (ASLRRA) is a non-profit trade association that represents the interests of its more than 400 short line and regional railroad members in legislative and regulatory matters.

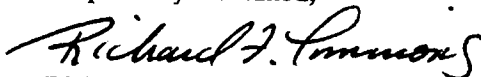
This letter is to advise that the ASLRRA and its members are opposed to the request of the Industrial Telecommunications Association (ITA) to become certified to coordinate frequencies designated as "LR" (i.e., railroad) channels in the FCC's rules.

Historically, the Association of American Railroads (AAR) has served as the railroad industry's sole frequency coordinator, and ASLRRA believes that AAR should continue in that role. Many aspects of mobile radio usage by railroads are unique to the rail industry (such as onboard communications devices like "end-of-train" links), and specialized knowledge of railroad operations is important for performing the frequency coordination for these links. AAR possesses that specialized knowledge, and does a good job coordinating frequencies for railroad use so as to avoid interference.

Allowing multiple entities to function as coordinators for railroad channels (especially entities such as ITA who have no expertise or background in rail operations) would introduce needless complexity into the frequency coordination process and possibly result in faulty coordination decisions that could lead to harmful interference in radio communications and disruption of rail operations.

In conclusion, ASLRRA recommends that the FCC dismiss the ITA request.

Respectfully submitted,


Richard F. Timmons

cc: Mr. Jeremy Denton
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